

DISCOVERY PLAN WORKSHEET

Tier I Pre-Settlement Discovery

Deadline for completion of Rule 26(a) initial disclosures
and HIPAA-complaint records authorizations: _____

Completion date for Phase I Discovery
as agreed upon by the parties: _____

*(Reciprocal and agreed upon document production,
generally not including depositions, unless otherwise agreed.
No more than 30 days after Initial Conference)*

Status conference TBD by the court: _____
(Generally 15 days post Tier I Discovery)

Tier II Discovery and Motion Practice

Submit proposed briefing schedule for motion to dismiss
~~Motion to join new parties or amend the pleadings:~~ to Judge Kybert by: 6/17/16
(Presumptively 15 days post status conference)

~~All~~
First requests for production of documents
and for interrogatories ^{due} due by: _____
(Presumptively 15 days post joining/amending) All responses due

6/28/16

7/28/16

8/29/16

11/18/16

All fact discovery completed by: _____
(Presumptively 3.5 months post first
requests for documents/interrogatories)

W. H. Review

Exchange of expert reports completed by: Joint Status letter
(Presumptively 30 days post fact discovery)

11/28/16

Expert depositions completed by: _____
(Presumptively 30 days post expert reports)

Final date to take first step in dispositive motion practice:
(Parties are directed to consult the District Judge's
individual rules regarding such motion practice.
Presumptively 30 days post expert depositions)

12/2/16

COMPLETION OF ALL DISCOVERY BY:

(Note: Presumptively 9 months after Initial Conference.) _____

Submission of joint pre-trial order: _____

Final Pre-Trial Conference TBD by the court: _____